



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MEMORANDUM

Date: January 16, 2014

Subject: KMG-B Penta OL Technical Penta

PC Code: 063001

EPA Reg. No.: 61483-3

Document Type: Acute Toxicity Review

MRID Nos.: 492571-01, 492571-02, 492571-03

DP Barcode: 417079

Case No.: 2505

CAS No.: 87-86-5

40 CFR: 158.500

From: Jolene Trujillo, Biologist
Risk Management and Implementation Branch V (7508P)
Pesticide Re-evaluation Division

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To: Bonnie Adler, CRM
Risk Management and Implementation Branch V (7508P)
Pesticide Re-evaluation Division

Applicant: KMG-Bernuth, Inc.
9555 W. Sam Houston Pkwy. S. Suite 600
Houston, TX 77099

Formulation from Label:

	% by wt.
<u>Active Ingredient(s):</u>	
Pentachlorophenol.....	86.0%
Other Chlorophenols.....	10.0%
<u>Other Ingredient(s):</u>	4.0%
Total	100.0%

BACKGROUND: In response to the previous acute toxicity review (DP# 414399, 09/06/13, J. Trujillo), the registrant has submitted new toxicity studies for acute oral toxicity, acute inhalation toxicity and primary dermal irritation to support the reregistration of their product EPA Reg. No. 61483-3. The MRID's are as follows: 492571-01 (81-1), 492571-02 (81-3), and 492571-03 (81-5). The studies were conducted by Product Safety Labs. The test material used in each of the studies was the subject product. Based on these product specific studies the toxicity profile has been revised and is listed below.

RECOMMENDATIONS:

- The acute toxicity studies submitted are acceptable to support the reregistration of EPA Reg. No. 61483-3.

The acute toxicity profile for EPA Reg. No. 61483-3 is currently:

Acute Oral	II	Acceptable
Acute Dermal	IV	Acceptable
Acute Inhalation	III	Acceptable
Primary Eye	II	Acceptable
Primary Dermal	IV	Acceptable
Skin Sensitization	non sensitizer	Cited

NOTE: The acute toxicity requirements have been satisfied for the subject product.

LABELING:

ID #: EPA Reg. No.: 61483-3/ KMG-B Penta AL Technical Penta RQ/Pentachlorophenol UN 3155

SIGNAL WORD: WARNING

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:*

May be fatal if swallowed. Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Harmful if inhaled. Avoid breathing dust. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse. Wear appropriate protective eyewear such a goggles or face shield.

*The designation of Personal Protective Equipment (PPE) for manufacturing use products does not fall under the jurisdiction of EPA, therefore, PPE has not been specified for this product.

FIRST AID:

IF SWALLOWED: Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

DATA EVALUATION RECORD

Product Reg. No.: 61483-3

Product Name: KMG-B Penta OL Technical Penta

1. DP BARCODE: 417079

2. PC CODE: 063001

3. CURRENT DATE : January 16, 2014

Study/Species/Lab Study # /Date	MRID	Results	Tox Cat	Grade
Acute oral toxicity / rat/ Product Safety Labs- No. 36945/09-20-13 OCSPP 870.1100; OECD 401	49257101	LD ₅₀ Females=146 mg/kg Up and Down Procedure <u>146 mg/kg Dose Level (4 animals)</u> One animal died within five hours of test substance administration. Prior to death- hypoactive and irregular respiration- Gross necropsy revealed mottled liver and discolored lungs. No gross abnormalities were noted for euthanized animals necropsied at the conclusion of 14 day study. <u>460 mg/kg Dose Level (3 animals)</u> All animals died within one day of dosing. Gross necropsy of the decedents revealed distention of the stomach or intestines and or mottled liver or discolored lungs.	II	A
Acute inhalation toxicity rat/ Product Safety Labs- No. 36946/10-03-13 OCSPP 870.1300; OECD 403	49257102	LC ₅₀ (♀+♂) between 0.53 mg/L and 2.09 mg/L 3.13 µm MMAD for 0.53 mg/L exposure 2.70 µm MMAD for 2.09 mg/L exposure <u>0.53 mg/L Exposure level:</u> All animals survived exposure to the test atmosphere. Following exposure all rats exhibited abnormal respiration and/or hypoactivity, by day 3	III	A

		all active and healthy. No gross abnormalities were noted for euthanized animals necropsied at the conclusion of 14 day observation period <u>2.09 mg/L Exposure level:</u> Nine animals died following exposure to the test atmosphere. No toxic signs noted prior to death. Single survivor exhibited abnormal respiration but recovered by day 3 and appeared active and healthy for the remainder of the study. Gross necropsy of decedents revealed discoloration of lungs and/or liver, and/or distention of the stomach. No gross abnormalities were noted for the surviving animal.		
Primary dermal irritation / rabbit / Product Safety Labs- No. 36947/09-10-13 OCSPP 870.2500; OECD 404	49257103	Minimal irritation Av primary irritation score=1.0 All scores 0 at 72 hrs	IV	A

Grade Key: A =Acceptable, U = Unacceptable, D = Data Gap